

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Application of FORENSIC NEWS LLC and
SCOTT STEDMAN for an Order Pursuant to 28
U.S.C. § 1782 to Conduct Discovery for Use in a
Foreign Proceeding.

Case No. 22-mc-00229

**DECLARATION OF ANNE CHAMPION IN SUPPORT OF PETITIONERS’
EX PARTE APPLICATION FOR JUDICIAL ASSISTANCE TO OBTAIN EVIDENCE
FOR USE IN A FOREIGN PROCEEDING PURSUANT TO 28 U.S.C. § 1782**

I, Anne Champion, hereby declare under penalty of perjury, pursuant to 28 U.S.C.

§ 1746, that the following is true and correct:

1. I am a partner in the law firm of Gibson, Dunn & Crutcher LLP, and am admitted to practice law in the State of New York, the United States District Courts for the Southern, District of New York. My firm represents Forensic News LLC and Scott Stedman (the “Petitioners”). I make this declaration in support of Petitioners’ application for Judicial Assistance to Obtain Evidence for use in a Foreign Proceeding Pursuant to 28 U.S.C. § 1782 (the “Application”). I am over the age of eighteen years and am not a party to this action.

2. Attached hereto as **Exhibit 1** is a true and correct copy of a proposed subpoena for Mark Rossini.

3. Attached hereto as **Exhibit 2** is a true and correct copy of a webpage entitled “About Us Forensic News Modern Investigative Journalism” published on the website for Forensic News LLC, available at <https://forensicnews.net/about/>.

4. Attached as **Exhibit 3** is a true and correct copy of a webpage entitled “Scott Stedman About The Author” found on the website for Simon & Schuster, available at <https://www.simonandschuster.com/authors/Scott-Stedman/158412147>.

5. Attached as **Exhibit 4** is a true and correct copy of the First Appendix to the Particulars of Claim filed in the High Court of Justice, Queen’s Bench Division, on August 16, 2020 in *Walter Tzvi Soriano v. Forensic News LLC, et al.* (Claim No. QB-2020-002450).

6. Attached as **Exhibit 5** is a true and correct copy of an article by Natasha Bertrand, entitled “Senate Intelligence Committee summons mysterious British security consultant,” published by Politico on June 5, 2019, available at <https://www.politico.com/story/2019/06/05/senate-intelligence-committee-british-security-consultant-1353675>.

7. Attached as **Exhibit 6** is a true and correct copy of an article published by Seth Hettena, entitled “Walter Soriano: The Security Consultant for Russian Oligarchs, the CIA . . . and Diego Maradona?” dated June 7, 2019, available at <https://sethhettena.com/2019/06/07/walter-soriano-the-security-consultant-for-russian-oligarchs-and-diego-maradona/>.

8. Attached as **Exhibit 7** is a true and correct copy of a press release published by the U.S. Department of the Treasury, entitled “Treasury Designates Russian Oligarchs, Officials, and Entities in Response to Worldwide Malign Activity,” dated April 6, 2018, available at <https://home.treasury.gov/news/press-releases/sm0338>.

9. Attached as **Exhibit 8** is a true and correct copy of an excerpt from Volume 5 of the Senate Committee on Intelligence’s Report on “Russian Active Measures Campaigns and

Interference in the 2016 U.S. Election,” dated August 18, 2020, available at https://www.intelligence.senate.gov/sites/default/files/documents/report_volume5.pdf.

10. Attached as **Exhibit 9** is a true and correct copy of an article published by the Times of Israel, entitled “Report: US Senate asks to interview Israeli-Brit in connection with Russia probe,” dated June 6, 2019, available at <https://www.timesofisrael.com/report-us-senate-asks-to-interview-israeli-brit-in-connection-with-russia-probe>.

11. Attached as **Exhibit 10** is a true and correct copy of the Particulars of Claim filed in the High Court of Justice, Queen’s Bench Division, on August 16, 2020 in *Walter Tzvi Soriano v. Forensic News LLC, et al.* (Claim No. QB-2020-002450).

12. Attached as **Exhibit 11** is a true and correct copy of the Judgment of the High Court of Justice, Queen’s Bench Division, in *Walter Tzvi Soriano v. Forensic News LLC, et al.* (Claim No. QB-2020-002450) filed January 15, 2021.

13. Attached as **Exhibit 12** is a true and correct copy of the Judgment of the Court of Appeal (Civil Division) in *Walter Tzvi Soriano v. Forensic News LLC, et al.* (Claim No. CA 2021-000484) filed December 21, 2021.

14. Attached as **Exhibit 13** is a true and correct copy of an article entitled “Landmark GDPR appeal allowed in Soriano v Forensic News LLC & ors,” published by 5RB on December 21, 2021, available at <https://www.5rb.com/news/landmark-gdpr-appeal-allowed-in-soriano-v-forensic-news-llc-ors>.

15. Attached as **Exhibit 14** is a true and correct copy of an article by Sam Tobin, entitled “Landmark jurisdiction ruling on data protection and libel claims,” published by the Law Society Gazette on December 22, 2021, available at

<https://www.lawgazette.co.uk/news/landmark-jurisdiction-ruling-on-data-protection-and-libel-claims/5111012.article>

16. Attached as **Exhibit 15** is a true and correct copy of Petitioners’ “Memorandum of Law in Support of Petitioners’ Application for an Order Pursuant to 28 U.S.C. § 1782,” filed in *In re Application of Forensic News LLC, et al.*, No. 1:22-mc-00993, ECF No. 2 (E.D.N.Y. Apr. 4, 2022) (Matsumoto, J.).

17. Attached as **Exhibit 16** is a true and correct copy of an excerpt of the transcript of the deposition of Richard Frankel, dated May 24, 2022.

18. Attached as **Exhibit 17** is a true and correct copy of Judge Matsumoto’s order granting Petitioners’ application for an order pursuant to 28 U.S.C. § 1782 in *In re Application of Forensic News LLC, et al.*, No. 1:22-mc-00993, ECF No. 11 (E.D.N.Y. Apr. 4, 2022) (Matsumoto, J.).

19. Attached as **Exhibit 18** is a true and correct copy of Petitioners’ “Memorandum of Law in Support of Petitioners’ Application for an Order Pursuant to 28 U.S.C. § 1782,” filed in *In re Application of Forensic News LLC, et al.*, 1:22-mc-01617, ECF No. 2 (E.D.N.Y. July 25, 2022) (Brodie, C.J.).

20. Attached as **Exhibit 19** is a true and correct copy of Magistrate Judge Merkl’s order granting Petitioners’ application for an order pursuant to 28 U.S.C. § 1782 in *In re Application of Forensic News LLC, et al.*, No. 1:22-mc-01617, ECF No. 13 (E.D.N.Y. Aug. 16, 2022) (Merkl, M.J.).

21. Attached as **Exhibit 20** is a true and correct copy of an article by Raphael Satter and Christopher Bing, entitled “How Mercenary Hackers Sway Litigation Battles,” published by

Reuters on June 30, 2022, available at <https://www.reuters.com/investigates/special-report/usa-hackers-litigation/>.

22. Attached as **Exhibit 21** is a true and correct copy of Mark Rossini's LinkedIn page, available at <https://www.linkedin.com/in/mark-rossini-80506827>.

23. Attached as **Exhibit 22** is a true and correct copy of a press release published by the U.S. Department of Justice, entitled "Former Federal Bureau of Investigations (FBI) Supervisory Special Agent Mark Rossini Sentenced for Criminally Accessing FBI Data," dated May 14, 2009, available at https://oig.justice.gov/sites/default/files/2019-12/2009_05_14a.pdf.

24. Attached as **Exhibit 23** is a true and correct copy of excerpts a Comprehensive Report on Mark Rossini provided by TransUnion, with redactions implemented consistent with Federal Rule of Civil Procedure 5.2(a) to protect personally identifying information.

25. Attached as **Exhibit 24** is a true and correct copy of an article by Jeff Stein, entitled "'The Looming Tower': former FBI Agent Mark Rossini Says Hulu's New Show Gets It Right," published by Newsweek on March 2, 2018, available at <https://www.newsweek.com/five-questions-mark-rossini-former-fbi-agent-center-events-hulus-looming-tower-829070>.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 23, 2022
New York, New York

/s/ Anne Champion
Anne Champion